



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building  
Philadelphia, Pennsylvania 19107

In Reply Refer To: 3AM22

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Michael A. Hanson, Manager  
Environmental Control/Environmental Affairs  
USS Technical Center  
4000 Tech Center Drive  
Monroeville, PA 15146

Dear Mr. Hanson:

By letter dated December 1, 1989, and subsequent correspondence dated March 20, 1990, USS, a division of the USX Corporation, submitted to the U.S. Environmental Protection Agency (EPA), a request for a Waiver of Compliance from the emission control requirements of Subpart L-National Emission Standard for Benzene Emissions from Coke By-Product Recovery Plants.

We have completed our review of your request, and pursuant to 40 CFR Section 61.11(a), grant a waiver of compliance for coke by-product units 1 and 2 at the Clariton Works facility located in Clariton, PA. This waiver has been granted to enable USS to install the proper emission control devices as required under Section 61.132 of Subpart L, the standard for controlling emissions from process vessels, storage tanks, and tar-intercepting sumps. This waiver applies specifically only to those sources for which a waiver of compliance has been granted (see attached list).

The modifications to units 1 and 2 are approved, and shall be completed as quickly as practicable, but in no event shall any stage of the work be completed later than the deadlines set forth in the following compliance schedule:

Issue Bid Requests	-	September 15, 1990
Issue Purchase Orders	-	September 15, 1990
Initiate Construction	-	October 15, 1990
Complete Construction	-	September 6, 1991
Final Compliance	-	September 13, 1991

In addition to the above schedule, USS shall comply with the reporting and recordkeeping requirements of Sections 61.138(a) and 61.138(b) by September 13, 1991. In addition, USS shall comply with the recordkeeping requirements of Section 61.138(c) of Subpart L by December 13, 1990. USS shall also submit monthly reports informing EPA of its current status and progress of their compliance schedule.

Section 61.11(c) gives EPA the authority to terminate a waiver at an earlier date than specified if the scheduled dates for compliance are not met. Failure to comply may result in a civil action for a permanent or temporary injunction, or assessment and recovery of a civil penalty of not more than \$25,000 per day of violation, or both.

This waiver of compliance relates only to 40 CFR Part 61 Subpart L and not to any other laws and requirements administered by EPA.

EPA intends to deny a waiver of compliance for sources that USS has scheduled for abandonment. The attempt to achieve compliance with the emission control requirements of Subpart L by shutting down or abandoning a source, is in direct violation of the Clean Air Act. Therefore, a waiver of compliance for those particular sources is not permissible. USS may present to the EPA additional information or arguments in regards to our decision within thirty (30) days of receipt of this letter. A final determination to deny your request for waiver will be made within 60 days after the presentation of additional information or argument, or within 60 days of the date of receipt of this letter.

If you have any questions, please contact Bernard E. Turlinski, Chief, Air Enforcement Branch, at (215) 597-3989 or Walter K. Wilkie of his staff at 597-6550.

Sincerely,



Edwin B. Erickson  
Regional Administrator

cc: James Salvaggio, PADER  
Charles Goetz, Allegheny Co. Dept. of Health

## Benzene Waiver and Denial List

Company: USS Corp.  
Location: Clariton, PA.

The following source(s) have been granted a waiver of compliance from Subpart L- National Emission Standard for Benzene Emissions from Coke By-Product Recovery Plants:

### Unit #1

1. Primary Cooler Condensate Sump
2. Weir Tank for Decanters #1, #2, and #3
3. Weir Tank for Decanters #4, #5, and #6
4. Flushing Liquor Decanter Tanks #1, #3, #5, and #6
5. Tar Collecting Tanks #1 thru #4
6. Flushing Liquor Collecting Tanks #1 and #3
7. Tar Storage Tanks #1 thru #4
8. Tar Separating Tank #1
9. Ammonia Storage Tanks #1 and #2

### Unit #2

1. Weir Tanks for Decanters #7, #8, and #9
2. Weir Tanks for Decanters #10, #11, and #12
3. Flushing Liquor Decanters #7, #8, #10, and #12
4. Tar Collecting Tanks #1, #3, #4, and #5
5. Tar Storage Tanks #5, #6, #8, and #9

### Final Cooler Area

1. Final Cooler Sump

EPA intends to deny a waiver of compliance for the following source(s):

### Unit #1

1. Flushing Liquor Decanters #2 and #4
2. Flushing Liquor Collecting Tank #2
3. Tar Separating Tank #2

### Unit #2

1. Flushing Liquor Decanters #9 and #11
2. Tar Collecting Tanks #2 and #6
3. Hot Drain Tank #7
4. Tar Separating Tanks #3 thru #6
5. Ammonia Storage Tanks #3 and #4